

Exhibit 1

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal Case No. 1:18-CR-457 (AJT)
	:	
BIJAN RAFIEKIAN, et al.	:	

PROTECTIVE ORDER

The Court having directed Covington & Burling LLP (“Covington”) and Kristin Verderame to produce “all documents within the scope of the subpoenas *duces tecum* . . . pursuant to a protective order to be agreed upon by the parties,” and the parties having agreed upon the entry of this protective order, it is hereby ORDERED that:

1. The production of any document by Covington and Verderame shall not constitute a waiver of any privilege or protection with respect to those documents or their subject matter in this or any proceeding.
2. The use of any document referenced in paragraph 1 above in a court filing shall not constitute a waiver of any privilege or protection with respect to those documents, provided that such documents are filed under seal.
3. Except with the prior authorization of the Court, the defendant and his attorneys shall not disclose to anyone the contents of the documents provided by Covington and Verderame.
4. Except with the prior authorization of the Court, any filing that mentions the contents of the documents provided by Covington and Verderame shall be filed under seal as well as filed through the ECF system with all such information redacted.

5. This Order shall be interpreted to provide the greatest protection allowed by Federal Rule of Evidence 502, or otherwise permitted by law.

6. This Court retains jurisdiction with respect to all matters arising from or related to the implementation of this Order.

Dated:
Alexandria, Virginia

The Honorable Anthony J. Trenga
United States District Judge